

**Attachment G-1**  
**Plaintiff's List of Documentary and Physical Evidence**

<b>No.</b>	<b>Document</b>
1	Job history, K.C. Marks
2	Performance Payment Award, 5/24/2001
3	Marks Performance Evaluation, June 8, 2001
4	City of Atlanta Job Description, Public Works Manager
5	2003 Organization Chart – Public Works-Administration
6	Letter from Mary Ann Johnson to Wanda Blackwell, 2/7/2003
7	City of Atlanta 2003 Budget (excerpts)
8	City of Atlanta 2003 Budget Mid-year Review
9	Email from Owens to KC Marks, 6/05/2003 re Yard Waste Statistics
10	Email from Griffin to Marks, 6/05/2003 re: Cabbage Town Initiatives MOU
11	Memo from Marks to Owens, 6/9/2003 re: Yard trimming statistics
12	Letter from Ga. Dept. of Natural Resources to K.C. Marks, 6/6/2003 re: Municipal Solid Waste Landfills
13	Memo from Marks to Owens, 7/23/2003 re: demolition estimate
14	Special Events 2003 chart
15	Department of Public Works/Solid Waste 2004 Proposed Budget
16	Major Operating Budget Issues 2004

- 17 Memo from Owens to Moraitakis, 7/14/2003 re: Garbage Collection Services
- 18 Department of Public Works 2004 Equipment Replacement and Requirement Schedule for Solid Waste Services
- 19 Mayor's Dashboard Reports, 2003
- 20 Department of Public Works employee lists, 8/15/03
- 21 Calendar for year 2003
- 22 Notice of Proposed Adverse Action, 8/11/2003
- 23 Supplementary Form, Notice of Proposed or Final Adverse Action
- 24 Notice of Final Adverse Action, 8/22/2003
- 25 City of Atlanta QPAI Manual
- 26 Memorandum from BPC to CSB, 12/16/2003 re: Marks five-day suspension
- 27 Unsigned and undated reprimand with attached Personnel Transaction and Certification signed by Owens 8/25/03
- 28 Memorandum to Scott from Johnson, 8/31/2003, re: K.C. Marks III Notice of Appeal
- 29 Memorandum from David Scott to Adam Smith, September 12, 2003, re: Recommendation for award of Emergency Contract C-513
- 30 Draft City-Consultant Agreement, C-513, Emergency Yard Collection and Grass Cutting Services
- 31 Memorandum from David Scott to Adam Smith, October 23, 2003, re: WCC Landscape Maintenance
- 32 Emergency Contract C-513A, Emergency Yard Trimmings and Grass Cutting Program

- 33 Memorandum from Owens to Marks, 9/29/2003, re Leave Request
- 34 Department of Public Works Leave Request Form submitted by K.C. Marks & signed by Owens 9/29/2003
- 35 Department of Public Works Leave Request Form, signed by Donna Owens 10/1/2003
- 36 Notice of Proposed Adverse Action of discharge signed by Owen 10/21/2003
- 37 Phone Memo to Comm. Scott from K.C. Marks, 10/22/2003
- 38 Letter to Marks to Scott, 10/23/2003
- 39 FMLA Request forms dated 10/14/2003
- 40 Certification of Serious Health Condition signed by Allen C. Carter, Ph.D., 10/22/2003
- 41 Letter from Johnson to Marks dated 12/22/2003, approving FMLA leave through 1/6/2004
- 42 Letter from Marks to Scott, 12/28/2003, requesting extension of leave
- 43 Pl. Ex. 17 Certification of Serious Health Condition signed by Allen C. Carter, Ph.D., 12/17/2003
- 44 Calendar for year 2004
- 45 "Phone Memo" to Donna from K.C., 1/5/0[4]
- 46 Letter from Johnson to Marks, 12/22/03, with handwritten note to "Evelyn"
- 47 Letter from Mary Ann Johnson to Marks, 1/8/2004
- 48 Letter from Scott to Marks, 1/8/2004

- 49 Notice of Proposed Adverse Action, 1/22/2004
- 50 Letter from Marks to Owens, 1/27/2004, with Express Mail receipt stamped 1/28/2004
- 51 Facsimile from Adkinson to Huber , February 4, 2004, with Notice of Proposed Adverse Action and attachments
- 52 Letter from Huber to Scott/Owens, 2/6/2004
- 53 EEOC Charge #110-2004-01766, stamped “received EEOC-ATDO 2/6/2004”
- 54 Fax to Evelyn Atkinson dated 2/10/2004, with handwritten note
- 55 Notice of Final Adverse Action, discharge, 2/10/2004
- 56 Personnel Transaction and Certification, 2/10/2004
- 57 Separation Notice dated 2/10/2004, for Dismissal – Abandonment of Job
- 58 Memo from Elder to Graham-Adkinson re Notice of Charge of Discrimination, February 23, 2004
- 59 Memorandum to Alfred Elder from Evelyn Graham-Adkinson, re: Discrimination Complaint, March 22, 2004
- 60 Letter to EEOC from Alfred Elder, 4/12/2004
- 61 Position statement, Enclosure (1) to letter to EEOC, 4/12/2004
- 62 Sanitation Field Superintendent Advertisement, Enclosure (1) to Elder letter to EEOC, 4/12/2004
- 63 Printout of computer screen, K.C. Marks III, with handwritten notes of job titles and dates
- 64 Letter to EEOC from Elder, 5/10/2004

- 65 Position Statement, Enclosure (1) to letter to EEOC from Elder, 5/10/2004
- 66 EEOC Determination, 6/8/2004
- 67 Letter from David Scott to Donald Murray, November 25, 2003, re: discharge from employment
- 68 Personnel Transaction and Certification promoting James Swope to Public Works Manager
- 69 Personnel Transaction and Certification promoting James Swope to Public Works Manager, Sr.
- 70 Letter from Alfred Elder to EEOC, 7/20/2004, requesting reconsideration of cause finding
- 71 Letter from Mary Ann Johnson to Ladun Esan, May 18, 2004, approving Family and Medical Leave through July 21, 2004
- 72 Email from Ladun Esan to Betty Harris, 7/21/2004
- 73 Letter from David Scott to Ladun Esan, 07/29/2004 re failure to contact supervisor by required date and failure to request additional leave
- 74 Internal emails Concerning Ladun Esan, dated August 16, 2004
- 75 Notice of Proposed Adverse Action of Dismissal to Ladun Esan
- 76 Personnel Transaction and Certification, Oladunjoye Esan, placing Esan on suspension with pay
- 77 Personnel Transaction and Certification, Oladunjoye Esan, employee returned from Family and Medical Leave effective 8/16/2004
- 78 Marks pay stubs, 9/29/03 to 12/11/2004
- 79 COA payroll screens for K.C. Marks III

- 80 City of Atlanta Family and Medical Leave policy, HR 4.05
- 81 City of Atlanta Code 114-76 to -87.
- 82 Attendance and Sick Leave ordinances, City of Atlanta
- 83 City of Atlanta Code, Grievances, 114-516 to 532
- 84 City of Atlanta Code, Disciplinary Action, 114-546 to 556
- 85 City of Atlanta Employee Handbook
- 86 Excel sheet showing value of backpay and benefits
- 87 Excel sheet showing interest on backpay, computed quarterly
- 88 City of Atlanta Ordinance 03-O-1855, approved November 24, 2003
- 89 City of Atlanta Classification and Salary Schedule, July 2004
- 90 City of Atlanta Classification and Salary Schedule, February 3, 2005  
revisions
- 91 City of Atlanta Classification and Salary Schedule, October 2005  
revisions
- 92 City of Atlanta Classification and Salary Schedule, August 2006  
revisions
- 93 City of Atlanta Ordinance 04-O-0068, providing for 2% COLA for all  
City employees effective July 1, 2004
- 94 City of Atlanta Ordinance 04-O-1921 providing for 1% COLA for  
certain City employees effective 1st pay period of 2005 budget year
- 95 City of Atlanta Ordinance 05-O-2269 providing for 2.2% COLA for  
all City employees, effective 1st pay period of 2006 budget year
- 96 Report of Paul Wright, with supporting calculations

- 97 Supplement to Report of Paul Wright, with supporting calculations
- 98 Paul Wright calculation of present value of Marks's future lost pension
- 99 City of Atlanta General Employees Pension Fund booklet
- 100 Pension information card, K.C. Marks III
- 101 Memorandum to K.C. Marks III from City of Atlanta Pension Dept., 3/9/2004
- 102 Marks job search log
- 103 Plaintiff's First Interrogatories and Requests for Production of Documents to Defendant City of Atlanta, served March 25, 2005
- 104 Defendant City of Atlanta's answers and objections to Plaintiff's First Interrogatories and Request for Production of Documents, served May 11, 2005
- 105 Letter from Mary J. Huber to Deborah Wakefield and Cleora Anderson, April 24, 2006, re: production of documents
- 106 Letter from Cleora Anderson to Mary J. Huber, May 24, 2006, re: lost email records
- 107 City of Atlanta "Partial Response to Request for Production 17"
  - Deposition transcript, Donna Owens
  - Deposition transcript, David Scott
  - Deposition transcript, Evelyn Adkinson
  - Deposition transcript, Mary Ann Johnson

Plaintiff reserves the right to introduce any document or exhibit listed on Defendant's Attachment G-2.